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Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND DAN CLARKE TO CONTINUE
HEARING ON MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Re: Dkt. Nos. 2823

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and Dan Clarke (“**Clarke**”),
4 on the other. The Debtors and Clarke are referred to in this Stipulation and Agreement for Order
5 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as
6 follows:

7 **RECITALS**

8 A. On June 19, 2019, Clarke filed the *Motion for Relief from the Automatic Stay*
9 [Dkt. No. 2823] (the “**Motion**”) which is currently set for a hearing at 9:30 a.m. on July 24, 2019
10 (the “**Hearing**”). Any response or opposition to the Motion by the Debtors or either official
11 committee appointed in this case is due by 4:00 p.m. (Pacific Time) on July 19, 2019.

12 B. The Parties have agreed, subject to formal documentation, to a resolution of the
13 Motion by allowing Clarke limited relief from the automatic stay.

14 C. The Parties’ respective counsel have agreed that the Hearing be continued to the
15 omnibus hearing scheduled for 9:30 a.m. on July 31, 2019, so that the Parties may prepare a
16 formal stipulation and proposed order granting Clarke limited relief from the automatic stay.

17 **NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND**
18 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
19 **JOINTLY REQUEST THE COURT TO ORDER, THAT:**

20 1. The Hearing on the Motion is continued to 9:30 a.m. (Pacific Time) on
21 July 31, 2019.

22 2. The time for the Debtors and the official appointed committees to respond
23 to the Motion shall be extended to 4:00 p.m. (Pacific Time) on July 26, 2019.

24 *[Signatures on next page]*
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Dated: July 18, 2019

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

/s/ Peter J. Benvenutti
Peter J. Benvenutti

*Attorneys for Debtors
and Debtors in Possession*

Dated: July 18, 2019

BELVEDERE LEGAL PC

/s/ Matthew D. Metzger
Matthew D. Metzger

Attorneys for Dan Clarke